

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<p>TONY KHOURY, Individually and on behalf all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>FXCM INC., DROR NIV, and ROBERT LANDE,</p> <p style="text-align: center;">Defendants.</p>	<p>No. 1:17-cv-00916 (RA)</p>
<p>YING ZHAO, Individually and on behalf all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>FXCM INC., DROR NIV, and ROBERT LANDE,</p> <p style="text-align: center;">Defendants.</p>	<p>No. 1:17-cv-00955</p>
<p>DAVID BLINN, Individually and on behalf all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>FXCM INC., DROR NIV, and ROBERT LANDE,</p> <p style="text-align: center;">Defendants.</p>	<p>No. 1:17-cv-01028</p>
<p>683 CAPITAL PARTNERS, L.P., Individually and on behalf all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>GLOBAL BROKERAGE, INC. f/k/a FXCM INC., DROR NIV, and ROBERT LANDE,</p> <p style="text-align: center;">Defendants.</p>	<p>No. 1:17-cv-02506</p>

**DECLARATION OF MATTHEW M. GUINEY  
IN SUPPORT OF MOTION FOR APPOINTMENT AS  
LEAD PLAINTIFF AND APPROVAL OF SELECTION OF COUNSEL**

I, Matthew M. Guiney, hereby declare:

1. I am a partner at the law firm of Wolf Haldenstein Adler Freeman & Herz LLP (“Wolf Haldenstein”). I submit this declaration in support of the motion of Sergey Regukh (“Movant”) for appointment as Lead Plaintiff and approval of Movant’s selection of Wolf Haldenstein as Lead Counsel.

2. Attached hereto as Exhibit 1 is a true and correct copy of the notice of pendency published on *Business Wire* on February 7, 2017.

3. Attached hereto as Exhibit 2 is a true and correct copy of Movant’s sworn certification, demonstrating his standing as a class member, as well as his requisite financial interest in the outcome of the litigation.

4. Attached hereto as Exhibit 3 is a true and correct copy of a loss chart detailing Movant’s transactions in shares of FXCM Inc. and demonstrating Movant’s losses therefrom.

5. Attached hereto as Exhibit 4 is a true and correct copy of my firm’s resume, setting forth Wolf Haldenstein’s background and considerable experience litigating complex securities class actions in federal and state courts throughout the country.

Signed under penalty of perjury this 10th day of April 2017.

/s/ Matthew M. Guiney  
Matthew M. Guiney